

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: Docket No. 690

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' MOTION FOR ENTRY
OF AN ORDER (I) AUTHORIZING THE DEBTORS TO SETTLE CLAIMS
UNDER CERTAIN EMPLOYMENT AGREEMENTS AND
(II) GRANTING RELATED RELIEF**

The undersigned hereby certifies that, as of the date hereof, no answer, objection, or any responsive pleading to the *Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Settle Claims Under Certain Employment Agreements and (II) Granting Related Relief* [Docket No. 690] (the “**Motion**”) filed by the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”) on November 13, 2023.

The undersigned further certifies that they have reviewed the Court’s docket in these cases and no answer, objection, or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Motion and Hearing filed contemporaneously with the Motion, responses to the Motion were to be filed no later than 4:00 p.m. (Eastern Daylight Time) on November 27, 2023 (the “**Objection Deadline**”). The Debtors therefore respectfully request that the proposed form of order attached hereto as **Exhibit A**, which is materially in the same form filed with the Motion, be entered at the earliest convenience of the Court.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Dated: November 28, 2023
Wilmington, Delaware

Respectfully submitted,

/s/ Morgan L. Patterson

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